

District Judge Tana Lin

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MUATAZ YAHYA ABDULJABBAR
AL KHATEEB,

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*,

Defendants.

Case No. 2:24-cv-00836-TL

STIPULATED MOTION FOR
EXTENSION OF DEADLINE AND
[~~PROPOSED~~] ORDER

Noted for Consideration:
February 13, 2025

Plaintiff and Defendants, pursuant to Federal Rule of Civil Procedure 6 and Local Rule 10(g), and hereby jointly stipulate and move to extend the deadline for U.S. Citizenship and Immigration Services (“USCIS”) to render a final determination on Plaintiff’s N-400, Application for Naturalization, to thirty days after the agency receives Plaintiff’s response to the Notice of Intent to Deny (“NOID”). A court may modify a deadline for good cause. Fed. R. Civ. P. 6(b). Continuing pretrial and trial dates is within the discretion of the trial judge. *See King v. State of California*, 784 F.2d 910, 912 (9th Cir. 1986).

Plaintiff brought this litigation pursuant to 8 U.S.C. § 1447(b), seeking adjudication of his naturalization application. On December 17, 2025, this Court remanded Plaintiff’s naturalization

1 application to USCIS with instructions. Dkt. No. 13, Order. First, the Order requires USCIS to
2 conduct a follow-up interview with Plaintiff within 30 days. Order, at 4. USCIS conducted this
3 interview on January 15, 2025. Second, the Order requires USCIS to issue a final determination
4 on Plaintiff's naturalization application within 30 days of the follow-up interview. *Id.* The parties
5 seek to extend this February 14, 2025 deadline for good cause.

6 On February 10, 2025, USCIS issued a NOID to Plaintiff. Plaintiff has until March 17,
7 2025 to respond to the NOID by submitting either a rebuttal or evidence to show that he can
8 overcome the listed grounds of denial. Plaintiff intends to submit a response. Once USCIS
9 receives Plaintiff's response, it will need additional time to review it and issue a decision. The
10 parties agree that 30 days from the date USCIS receives Plaintiff's response is a reasonable period
11 for this to occur. Plaintiff's counsel agrees to notify Defendants' counsel when the response is
12 submitted and provide tracking information.

13 As additional time is necessary for this to occur, the parties move to extend USCIS's
14 deadline to issue a determination to 30 days from the date that USCIS receives Plaintiff's response
15 to the NOID. The parties will submit a joint status report within 7 days of completion of
16 adjudication by USCIS.

17
18 //

19
20 //

21
22 //

23
24 //

1 DATED this 13th day of February, 2025

2 Respectfully submitted,

3 TEAL LUTHY MILLER
Acting United States Attorney

GAIRSON LAW, LLC

4 s/ Michelle R. Lambert
5 MICHELLE R. LAMBERT, NYS #4666657
Assistant United States Attorney
6 United States Attorney's Office
Western District of Washington
7 1201 Pacific Avenue, Suite 700
Tacoma, Washington 98402
8 Phone: (206) 553-7970
Fax: (206) 553-4067
9 Email: michelle.lambert@usdoj.gov

s/ Jay Gairson
JAY GAIRSON, WSBA No. 43365
Gairson Law, LLC
4606 Martin Luther King Jr.. Way S.
Seattle, Washington 98108
Phone: 206-357-4218
Email: jay@gairson.com
Attorneys for Plaintiff

10 *Attorneys for Defendants*

11 *I certify that this memorandum contains 345*
12 *words, in compliance with the Local Civil Rules.*

13
14 **[PROPOSED] ORDER**

15 **IS SO ORDERED.**

16
17 DATED this 14th day of February, 2025.

18
19
20 

21 Tana Lin
22 United States District Judge
23
24